

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS, and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

CIVIL ACTION NO. 2:23-CV-00352

JURY TRIAL DEMANDED

**AGREED MOTION FOR EXTENSION OF TIME TO FILE DOCKET CONTROL
ORDER, DISCOVERY ORDER, AND PROTECTIVE ORDER**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) hereby stipulate and agree, with the Court’s permission, to an extension of time for the Parties to file a Proposed Docket Control Order and Proposed Discovery Order from **October 12, 2023** to on or before **October 19, 2023**. Further, the Parties stipulate and agree, with the Court’s permission, to an extension of time for the Parties to file a Proposed Protective Order from **October 19, 2023** to on or before **October 26, 2023**.

The Parties do not file this Agreed Motion for purposes of delay, but rather to allow the Parties adequate time to address the deadlines, obligations, and protections afforded by these proposed orders, particularly in light of the recent Federal holiday on October 9, 2023.

DATED: October 11, 2023

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*Attorneys for Defendants Cellco Partnership,
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CERTIFICATE OF SERVICE

I hereby certify that, on October 11, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez

CERTIFICATE OF CONFERENCE

I hereby certify that, on October 11, 2023, counsel for Verizon conferred with counsel for Plaintiff Headwater Research LLC and that this Agreed Motion is unopposed.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez